EXHIBIT A

SEPARATE ENGINEERING STATEMENTS

FOR

KAKM-DT, KTUU-DT AND KIMO-DT

ENGINEERING STATEMENT
IN SUPPORT OF SECOND AMENDMENT TO JOINT PETITION
FOR RULE MAKING
KAKM-DT, ANCHORAGE, ALASKA
CHANNEL 8 50 KW MAX. 240 METERS
MARCH 2004

This engineering statement has been prepared on behalf of Alaska Public Telecommunications, Inc., licensee of station KAKM(TV), and permittee of KAKM-DT, Anchorage, Alaska in support of a Second Amendment to Joint Petition for Rule Making filed on February 23, 2003 and previously amended on July 24, 2003, ("JPRM") to substitute Channel 8 for the allotted Channel 24 for its digital television (DTV) operation.

At present KAKM(TV) operates on analog Channel 7 (174-180 MHz) with 288 kW effective radiated power (ERP) and 240 meters antenna height above average terrain (HAAT) using a non-directional TV antenna from the Frank A. Mengel tower site ("F.A.M. Tower Site"). The geographic coordinates of that site are as follows: N 61° 25' 22", W 149° 52' 20". The F.A.M Tower Site is located approximately 22.7 km (14 miles) north of Anchorage.

The Commission has allotted KAKM(TV) Channel 24 for its digital television (DTV) operation with 1000 kW ERP and 240 meters HAAT. KAKM-DT currently holds a construction permit to operate on DTV Channel 24 with 50 kW ERP and 109 meters HAAT using a non-directional TV antenna from an antenna site which is located in downtown Anchorage, Alaska.

In the JRMP, the licensees/permittees of stations KAKM(TV)/KAKM-DT, KTUU-TV/KTUU-DT and KIMO(TV)/KIMO-DT proposed the following amendment to Section 73.622(b) (Digital Television Table of Allotments) of the Commission's rules.

Community	Current Allotment	Proposed Allotment
Anchorage, AK	18, 20, 22, *24, *26 28, 30, 32	*8, 10, 12, 20, 22, *26, 30, 32

The JRMP specified that the substitute DTV channels would be used by the respective DTV stations at the F.A.M. Tower Site. The Second Amendment to the JRMP

("Second Amendment") proposes further changes to the maximum power levels and/or directional antenna system for each DTV allotment. Specifically, the Second Amendment, as it applies to KAKM-DT specifies a slightly different power level for the station. The amended Channel 8 DTV allotment for station KAKM-DT is for 50 kW maximum ERP and 240 meters HAAT (271 meters antenna radiation center above mean sea level) from the F.A.M. Tower Site which is the licensed site for KAKM(TV). The geographic coordinates of the KAKM(TV) site, and thus for the collocated KAKM-DT site, are set forth above.

The attached Tables I and II provide the relative field values for the directional horizontal and vertical patterns of the directional antenna associated with the KAKM-DT Channel 8 DTV allotment.

Analog TV and DTV Allocation Situation

The attached Table III shows the analog TV and DTV stations within 500 km of KAKM-DT site on co-channel 8 and adjacent channels 7 and 9. There are no TV or DTV stations or allotments on Channel 8 within 500 km of KAKM-DT site. The FCC database shows there are two pending applications for Channel 9 analog TV station at Anchorage, Alaska. These applications have been filed by Alaska Broadcast TV, Inc. ("ABTV") (BPET-19960916KE) and Alaska Public Telecommunications ("APT") (BPET-19961115KE). The proposed ABTV Channel 9 analog TV antenna site is located 40.2 km south of KAKM-DT. The proposed APT Channel 9 analog TV site is co-located with KAKM-DT site. ABTV and APT have filed with the Commission a "Joint Request for Approval of Agreement" ("joint Request") which, if granted, will result in the

dismissal of APT's Channel 9 analog TV application and the grant of ABTV's Channel 9 analog TV application.

OET Bulletin 69 Study

Since the ABTV Channel 9 antenna site is located more than 11 km and less than 125 km from the KAKM-DT site, an electromagnetic interference study was conducted according to the FCC OET Bulletin 69 to determine any impact on ABTV's analog Channel 9 operation.

The FCC OET Bulletin 69 study was conducted for cell sizes 0.5 km/side and 1 km terrain intervals. In addition, the KAKM-DT ERP in each direction was adjusted according to the horizontal and vertical directional patterns of the DTV antenna.

The results of the OET Bulletin 69 study are provided in the attached Table IV, and indicate the proposed Channel 8 DTV operation of KAKM-DT would cause interference to more than 2.8% population of the Grade B contour of ABTV's proposed Channel 9 operation. However, as shown in Section 2 of the Settlement Agreement which is attached to the Joint Request ABTV has agreed to accept any interference caused by the proposed KAKM-DT operation on Channel 8 with up to 100 kW.

Principal Community Coverage

The attached map shows the computed 36 dBu contour for the proposed KAKM-DT operation on Channel 8 with 50 kW maximum ERP and 240 meters HAAT using a directional antenna. The map indicates the proposed 36 dBu contour would cover all of Anchorage, Alaska.

It has been demonstrated above the proposed substitution of Channel 8 for Channel 24 would be in compliance of the Commission's rules and policies. Therefore,

the Alaska Public Telecommunications, Inc. respectfully requests the Commission to allot Channel 8 for KAKM(TV) for its DTV operation (KAKM-DT) at Anchorage, Alaska.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

S. K. Khanna

11 March 2004

S. K. Khanna
Professional Engineer
District of Columbia, PE License No.8057

TABLE I
KAKM-DT, CHANNEL 8, ANCHORAGE, ALASKA
HORIZONTAL DIRECTIONAL RADIATION PATTERN
MARCH 2004

AZIMUTH	RELATIVE FIELD	ERP/kW
0.0	0.710	25.21
10.0	0.800	32.00
20.0	0.870	37.85
30.0	0.950	45.13
40.0	0.960	46.08
50.0	0.900	40.50
60.0	0.820	33.62
70.0	0.740	27.38
80.0	0.680	23.12
90.0	0.640	20.48
100.0	0.730	26.65
110.0	0.830	34.45
120.0	0.940	44.18
130.0	0.970	47.05
140.0	0.940	44.18
150.0	0.840	35.28
160.0	0.750	28.13
170.0	0.690	23.81
180.0	0.680	23.12
190.0	0.750	28.13
200.0	0.830	34.45
210.0	0.910	41.41
220.0	0.930	43.25
230.0	0.890	39.61
240.0	0.810	32.81
250.0	0.740	27.38
260.0	0.690	23.81
270.0	0.700	24.50
280.0	0.780	30.42
290.0	0.870	37.85
300.0	0.940	45.03
310.0	0.940	44.18
320.0	0.860	36.98
330.0	0.800	32.00
340.0	0.710	25.21
350.0	0.660	21.78
37.0	1.000	50.00
129.0	1.000	50.00

TABLE II
KAKM-DT, CHANNEL 8, ANCHORAGE, ALASKA
VERTICAL DIRECTIONAL RADIATION PATTERN
MARCH 2004

AZIMUTH	RELATIVE FIELD
-16.0	0.010
-15.0	0.060
-14.0	0.110
-13.0	0.130
-12.0	0.100
-11.0	0.040
-10.0	0.070
-9.0	0.170
-8.0	0.230
-7.0	0.190
-6.0	0.090
-5.0	0.130
-4.0	0.390
-3.0	0.650
-2.0	0.871
-1.0	0.979
-0.6	1.000
0.0	0.979
1.0	0.871
2.0	0.650
3.0	0.390
4.0	0.130
5.0	0.090
6.0	0.190
7.0	0.230
8.0	0.170
9.0	0.070
10.0	0.040
11.0	0.780
12.0	0.949
13.0	0.940
14.0	0.860
15.0	0.800

TABLE III
ANALOG TV AND DTV ALLOCATION SITUATION
FOR THE PROPSOED DTV OPERATION OF
KAKM-DT, ANCHORAGE, ALASKA
CHANNEL 8 50 KW 240 METERS
MARCH 2004

CHANNEL	CALL	CITY/ STATE	GEOGRAPHIC COORDINATES	DISTANCE km
8	KAKM-DT	Anchorage, AK	N 61-25-22 W 149-52-20	--
7	KAKM(TV)	Anchorage, AK	N 61-25-22 W 149-52-20	0.0
7	KFXF(TV)	Fairbanks, AK	N 64-55-20 W 147-42-55	404.9
8	None within 500 km		--	--
9	Application BPET-19960916KE	Anchorage, AK	N 61-04-02 W 149-44-36	40.2
9	Application BPET-19961115KE	Anchorage, AK	N 61-25-22 W 149-52-20	0.0

TABLE IV

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-10-2004 Time: 15:25:17

Record Selected for Analysis

NEW USERRECORD-01 ANCHORAGE
AK US
Channel 08 ERP 50. kW HAAT 240. m RCAMSL 00271 m
Latitude 061-25-22 Longitude 0149-52-20
Status APP Zone 2 Border
Dir Antenna Make usr Model KTUUH Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 0.5 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	36.0 dBu F(50,90) (km)
0.0	21.815	227.7	94.5
45.0	37.528	202.5	96.3
90.0	17.613	270.3	95.5
135.0	39.172	260.2	101.4
180.0	19.874	270.9	96.4
225.0	35.700	239.2	99.3
270.0	21.178	235.4	95.0
315.0	35.060	217.2	97.2

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

NEW 08 ANCHORAGE
AK USERRECORD01

and station

SHORT TO: 960916KE 09 ANCHORAGE AK BPET 19960916KE
061-04- 2 0149-44-36
Req. separation => 11.0 <= 125.0 Actual separation 40.2 Short 84.8(29.2) km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Channel	Call	City/State	ARN
08	NEW	ANCHORAGE AK	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan No.	Call	City/State	Dist(km)	Status	Application Ref.
07	KAKM	ANCHORAGE AK	0.0	LIC	BLET -19980917KE
09	961115KE	ANCHORAGE AK	0.0	APP	BPET -19961115KE
09	960916KE	ANCHORAGE AK	40.1	APP	BPET -19960916KE

%%
%

Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
07	KAKM	ANCHORAGE AK	DTVPLN -NPLN0454

Stations Potentially Affecting This Station

Chan No.	Call	City/State	Dist(km)	Status	Application Ref.

```
 07   KFXF     FAIRBANKS AK              392.2  PLN    DTVPLN     -
NPLN0455

Results for:  7N AK ANCHORAGE            DTVPLN    NPLN0454     PLN
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour          264909       26134.5
   not affected by terrain losses        263914       22460.3
   lost to NTSC IX                            0           0.0
   lost to additional IX by ATV               0           0.0
   lost to all IX                             0           0.0

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   07      KAKM       ANCHORAGE AK             BLET      -19980917KE

     Stations Potentially Affecting This Station

Chan   Call      City/State       Dist(km) Status  Application Ref. No.
 07   KFXF     FAIRBANKS AK       403.7  LIC    BLCT      -20010302ABT
 08   NEW      ANCHORAGE AK       0.0    APP              USERRECORD-01
 Proposal causes no interference

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     Analysis of Interference to Affected Station   2


NTSC Baseline Analysis
Channel     Call          City/State        Application Ref. No.
   09      NEW        ANCHORAGE AK             DTVPLN    -NPLN0576

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref.
No.

Results for:  9N AK ANCHORAGE            DTVPLN    NPLN0576     PLN
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour          289136       28253.6
   not affected by terrain losses        269649       24921.3
   lost to NTSC IX                            0           0.0
   lost to additional IX by ATV               0           0.0
   lost to all IX                             0           0.0

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   09      961115KE   ANCHORAGE AK             BPET      -19961115KE

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref.
No.
 09   KUAC-TV  FAIRBANKS AK       401.7  LIC    BLET      -319
 08   NEW      ANCHORAGE AK       0.0    APP    USERRECORD-01
 Proposal causes no interference
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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
09	960916KE	ANCHORAGE AK	BPET	-19960916KE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
08	NEW	ANCHORAGE AK	40.1	APP	USERRECORD-01

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 3
Before Analysis

Results for: 9N AK ANCHORAGE BPET 19960916KE APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	289136	28253.6
not affected by terrain losses	269649	24921.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 9N AK ANCHORAGE BPET 19960916KE APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	289136	28253.6
not affected by terrain losses	269649	24921.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	8163	294.8
lost to all IX	8163	294.8

Potential Interfering Stations Included in above Scenario 1

8A AK ANCHORAGE
USERRECORD01 APP

The following station failed the de minimis interference criteria.
8D AK ANCHORAGE
USERRECORD01
ERP 50.00 kW HAAT 240.0 m RCAMSL 271.0 m
Antenna usr KTUUH

```
 Due to interference to the following station and scenario:     1
  9N AK ANCHORAGE            BPET      19960916KE
 ERP  316.00 kW  HAAT   212.0 m  RCAMSL   538.0 m
 Antenna     99999999999999

 Percent new DTV interference without proposal: 0.0  BPET 19960916KE
 Percent new DTV interference with proposal:    2.8  BPET 19960916KE


 Proposed station is MX
 8A AK ANCHORAGE
 USERRECORD01           APP
 9N AK ANCHORAGE            BPET      19960916KE   APP

 Proposal MX with BPET      19960916KE   scenario      1 of station
3


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     Analysis of Interference to Affected Station   4


Analysis of current record
Channel     Call           City/State        Application Ref. No.
   08      NEW         ANCHORAGE
 AK   USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref.
No.
 07   KAKM     ANCHORAGE AK               0.0  LIC    BLET       -
19980917KE
 09   961115KE ANCHORAGE AK               0.0  APP    BPET       -
19961115KE
 09   960916KE ANCHORAGE AK              40.1  APP    BPET       -
19960916KE

 Total scenarios =   1


Result key:        2
Scenario        1  Affected station        4
Before Analysis

Results for:  8A AK ANCHORAGE
 USERRECORD01           APP
   HAAT  240.0 m, ATV ERP   50.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      265309      29764.7
   not affected by terrain losses    264328      26144.1
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV           0          0.0
```

lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

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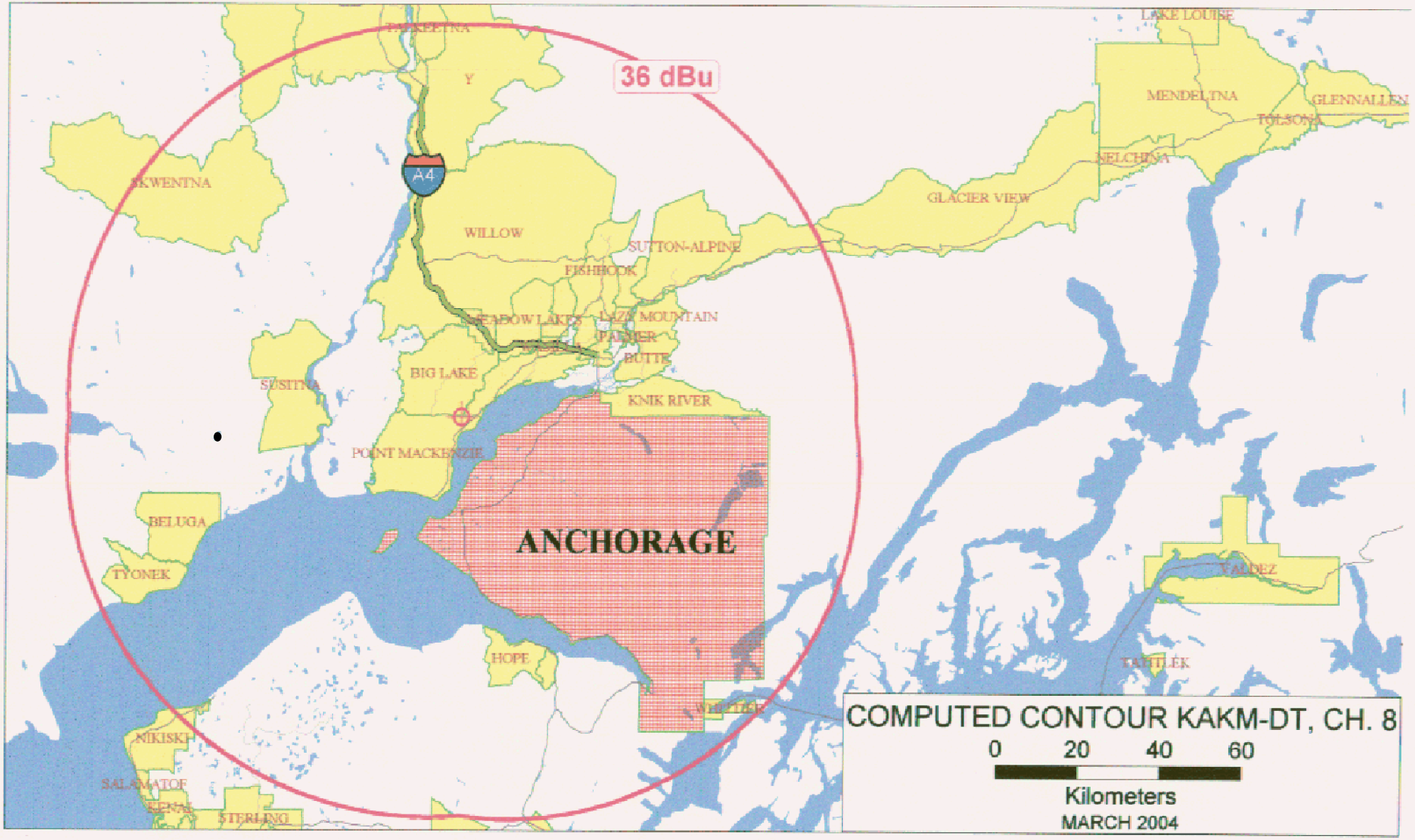
FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED


36 dBu
A4
PALMER
WASILLA
KNIK RIVER
ANCHORAGE
COMPUTED CONTOUR KAKM-DT, CH. 8
0 20 40 60
Kilometers
MARCH 2004

ENGINEERING STATEMENT
IN SUPPORT OF SECOND AMENDMENT TO JOINT PETITION
FOR RULE MAKING
KTUU-DT, ANCHORAGE, ALASKA
CHANNEL 10 27 KW MAX. 240 METERS
MARCH 2004

This engineering statement has been prepared on behalf of Channel 2 Broadcasting Company, licensee of station KTUU-TV, and permittee of KTUU-DT, Anchorage, Alaska in support of a Second Amendment to Joint Petition for Rule Making filed on February 23, 2003 and previously amended on July 24, 2003, ("JPRM") to substitute Channel 10 for the allotted Channel 18 for its digital television (DTV) operation on KTUU-DT.

At present KTUU-TV operates on analog Channel 2 (54-60 MHz) with 100 kW effective radiated power (ERP) and 219 meters antenna height above average terrain (HAAT) using a non-directional TV antenna from the Frank A. Mengel tower site ("F.A.M. Tower Site"). The geographic coordinates of that site are as follows: N 61° 25' 22", W 149° 52' 20". The F.A.M Tower Site is located approximately 22.7 km (14 miles) north of Anchorage.

The Commission has allotted KTUU-TV Channel 18 for its digital television (DTV) operation with 1000 kW ERP and 219 meters HAAT. KTUU-DT currently holds a construction permit to operate on DTV Channel 18 with 50 kW ERP and 143 meters HAAT using a non-directional TV antenna from an antenna site which is located in downtown Anchorage, Alaska.

In the JRMP, the licensees/permittees of stations KTUU-TV/KTUU-DT, KAKM(TV)/KAKM-DT and KIMO(TV)/KIMO-DT proposed the following amendment to Section 73.622(b) (Digital Television Table of Allotments) of the Commission's rules.

Community	Current Allotment	Proposed Allotment
Anchorage, AK	18, 20, 22, *24, *26 28, 30, 32	*8, 10, 12, 20, 22, *26, 30, 32

The JRMP specified that the substitute DTV channels would be used by the respective DTV stations at the F.A.M. Tower Site. The Second Amendment to the JRMP ("Second Amendment") proposes further changes to the maximum power levels and/or directional antenna system for each DTV allotment. Specifically, the Second Amendment, as it applies to KTUU-DT specifies a slightly different power level for the station. The amended Channel 10 DTV allotment for station KTUU-DT is for 27 kW maximum ERP and 240 meters HAAT (271 meters antenna radiation center above mean sea level) from the F.A.M. Tower Site which is the licensed site for KTUU-TV. The geographic coordinates of the KTUU-TV site, and thus for the collocated KTUU-DT site, are set forth above.

The attached Tables I and II provide the relative field values for the directional horizontal and vertical patterns of the directional antenna associated with the KTUU-DT Channel 10 DTV allotment.

Analog TV and DTV Allocation Situation

The attached Table III shows the analog TV and DTV stations within 500 km of KTUU-DT site on co-channel 10 and adjacent channels 9 and 11. There are no TV or DTV stations or allotments on Channel 10 within 500 km of KTUU-DT site. Station KTVA-TV, Channel 11, Anchorage, Alaska, site is located 25.7 km south of the KTUU-DT site. In addition, the FCC database shows there are two pending applications for Channel 9 analog TV station at Anchorage, Alaska. These applications have been filed by Alaska Broadcast TV, Inc. (ABTV) (BPET-19960916KE) and Alaska Public Telecommunications (APT) (BPET-19961115KE). The proposed ABTV Channel 9 analog TV antenna site is located 40.2 km south of KTUU-DT. The proposed APT

Channel 9 analog TV site is co-located with KTUU-DT site. ABTV and APT have filed with the Commission a "Joint Request for Approval of Agreement" which, if granted, will result in the dismissal of APT's Channel 9 analog TV application and the grant of ABTV's Channel 9 analog TV application.

OET Bulletin 69 Study

Since the ABTV Channel 9 and the licensed KTVA, Channel 11 antenna sites are located more than 11 km and less than 125 km from the KTUU-DT site, electromagnetic interference studies were conducted according to the FCC OET Bulletin 69 to determine any impact on these two analog TV operations.

The FCC OET Bulletin 69 study was conducted for cell sizes 0.5 km/side and 1 km terrain intervals. In addition, the KTUU-DT ERP in each direction was adjusted according to the horizontal and vertical directional patterns of the DTV antenna.

The results of the OET Bulletin 69 study are provided in the attached Table IV, and indicate the proposed Channel 10 DTV operation of KTUU-DT would not cause harmful interference to more than 2% population of the Grade B contours of KTVA-TV and the proposed ABTV Channel 9 operation. Therefore, the proposed Channel 10 DTV operation at Anchorage, Alaska would be in compliance of Section 73.623(c) of the Commission's rules.

Principal Community Coverage

The attached map shows the computed 36 dBu contour for the proposed KTUU-DT operation on Channel 10 with 27 kW maximum ERP and 240 meters HAAT using a directional antenna. The map indicates the proposed 36 dBu contour would cover all of Anchorage, Alaska.

It has been demonstrated above the proposed substitution of Channel 10 for Channel 18 would be in full compliance of the Commission's rules. Therefore, the Channel 2 Broadcasting Company respectfully requests the Commission to allot Channel 10 for KTUU-TV for its DTV operation (KTUU-DT) at Anchorage, Alaska.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

S. K. Khanna

11 March 2004

S. K. Khanna
Professional Engineer
District of Columbia, PE License No.8057

TABLE I
KTUU-DT, CHANNEL 10, ANCHORAGE, ALASKA
HORIZONTAL DIRECTIONAL RADIATION PATTERN
MARCH 2004

AZIMUTH	RELATIVE FIELD	ERP/kW
0.0	0.710	13.61
10.0	0.800	17.28
20.0	0.870	20.43
30.0	0.950	24.36
40.0	0.960	24.88
50.0	0.900	21.87
60.0	0.820	18.15
70.0	0.740	14.79
80.0	0.680	12.48
90.0	0.640	11.06
100.0	0.730	14.39
110.0	0.830	18.60
120.0	0.940	23.86
130.0	0.970	25.40
140.0	0.940	23.85
150.0	0.840	19.05
160.0	0.750	15.19
170.0	0.690	12.85
180.0	0.680	12.48
190.0	0.750	15.19
200.0	0.830	18.60
210.0	0.910	22.36
220.0	0.930	23.35
230.0	0.890	21.39
240.0	0.810	17.71
250.0	0.740	14.79
260.0	0.690	12.85
270.0	0.700	13.23
280.0	0.780	16.43
290.0	0.870	20.44
300.0	0.940	23.89
310.0	0.940	23.89
320.0	0.860	19.97
330.0	0.800	17.28
340.0	0.710	13.61
350.0	0.660	11.76
37.0	1.000	27.00
129.0	1.000	27.00

TABLE II
KTUU-DT, CHANNEL 10, ANCHORAGE, ALASKA
VERTICAL DIRECTIONAL RADIATION PATTERN
MARCH 2004

AZIMUTH	RELATIVE FIELD
-16.0	0.010
-15.0	0.060
-14.0	0.110
-13.0	0.130
-12.0	0.100
-11.0	0.040
-10.0	0.070
-9.0	0.170
-8.0	0.230
-7.0	0.190
-6.0	0.090
-5.0	0.130
-4.0	0.390
-3.0	0.650
-2.0	0.871
-1.0	0.979
-0.6	1.000
0.0	0.979
1.0	0.871
2.0	0.650
3.0	0.390
4.0	0.130
5.0	0.090
6.0	0.190
7.0	0.230
8.0	0.170
9.0	0.070
10.0	0.040
11.0	0.780
12.0	0.949
13.0	0.940
14.0	0.860
15.0	0.800

TABLE III
ANALOG TV AND DTV ALLOCATION SITUATION
FOR THE PROPSOED DTV OPERATION OF
KTUU-DT, ANCHORAGE, ALASKA
CHANNEL 10 27 KW 240 METERS
MARCH 2004

CHANNEL	CALL	CITY/ STATE	GEOGRAPHIC COORDINATES	DISTANCE km
10	KTUU-DT	Anchorage, AK	N 61-25-22 W 149-52-20	--
9	Application BPET-19960916KE	Anchorage, AK	N 61-04-02 W 149-44-36	40.2
9	Application BPET-19961115KE	Anchorage, AK	N 61-25-22 W 149-52-20	0.0
10	None within 500 km		--	--
11	KTVA(TV) LIC	Anchorage, AK	N 61-11-33 W 149-54-01	25.7

TABLE IV

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-02-2004 Time: 16:33:34

Record Selected for Analysis

NEW USERRECORD-01 ANCHORAGE
AK US
Channel 10 ERP 27. kW HAAT 240. m RCAMSL 00271 m
Latitude 061-25-22 Longitude 0149-52-20
Status APP Zone 2 Border
Dir Antenna Make usr Model KTUUH Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 0.5 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	36.0 dBu F(50,90) (km)
0.0	11.805	227.7	89.9
45.0	20.311	202.5	91.8
90.0	9.528	270.3	90.7
135.0	21.198	260.2	96.5
180.0	10.752	270.9	91.7
225.0	19.320	239.2	94.5
270.0	11.459	235.4	90.2
315.0	18.974	217.2	92.6

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

NEW 10 ANCHORAGE
AK USERRECORD01

and station

SHORT TO: 960916KE 09 ANCHORAGE AK BPET 19960916KE
061-04- 2 0149-44-36
Req. separation => 11.0 <= 125.0 Actual separation 40.2 Short 84.8(29.2) km

SHORT TO: KTVA 11 ANCHORAGE AK BLCT 19831019KM
061-11-33 0149-54- 1
Req. separation => 11.0 <= 125.0 Actual separation 25.7 Short 99.3(14.7) km

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountian

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

****

Start of Interference Analysis

Proposed Station

Channel	Call	City/State	ARN
10	NEW	ANCHORAGE AK	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
09	961115KE	ANCHORAGE AK	0.0	APP	BPET - 19961115KE
09	960916KE	ANCHORAGE AK	40.1	APP	BPET - 19960916KE
11	KTVA	ANCHORAGE AK	0.0	CP	BPCT - 20010426AAO
11	KTVA	ANCHORAGE AK	25.6	LIC	BLCT - 19831019KM

%%

Analysis of Interference to Affected Station 1

```
NTSC Baseline Analysis
Channel     Call          City/State        Application Ref. No.
   09       NEW        ANCHORAGE AK            DTVPLN     -NPLN0576

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref.
No.

Results for:  9N AK ANCHORAGE            DTVPLN    NPLN0576     PLN
                                    POPULATION   AREA (sq km)
   within Noise Limited Contour       289136      28253.6
   not affected by terrain losses     269649      24921.3
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV            0          0.0
   lost to all IX                          0          0.0

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   09       961115KE   ANCHORAGE AK            BPET       -19961115KE

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref.
No.
 09    KUAC-TV   FAIRBANKS AK          401.7  LIC     BLET       -319
 10    NEW       ANCHORAGE
 AK      0.0  APP     USERRECORD-01
 Proposal causes no interference

#########################################################################
#


     Analysis of Interference to Affected Station   2


Analysis of current record
Channel     Call          City/State        Application Ref. No.
   09       960916KE   ANCHORAGE AK            BPET       -19960916KE

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref.
No.
 10    NEW       ANCHORAGE
 AK     40.1  APP     USERRECORD-01

 Total scenarios =   1


Result key:        1
Scenario        1  Affected station        2
Before Analysis
```

Results for: 9N AK ANCHORAGE BPET 19960916KE APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	289136	28253.6
not affected by terrain losses	269649	24921.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 9N AK ANCHORAGE BPET 19960916KE APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	289136	28253.6
not affected by terrain losses	269649	24921.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	4883	146.5
lost to all IX	4883	146.5

Potential Interfering Stations Included in above Scenario 1

10A AK ANCHORAGE
USERRECORD01 APP

##
#

Analysis of Interference to Affected Station 3

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
11	KTVA	ANCHORAGE AK	DTVPLN -NPLN0694

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.

Results for: 11N AK ANCHORAGE DTVPLN NPLN0694 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	250632	10652.7
not affected by terrain losses	249923	9759.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Analysis of current record

Channel	Call	City/State	Application Ref. No.
11	KTVA	ANCHORAGE AK	BPCT -20010426AAO

Stations Potentially Affecting This Station

```
Chan   Call      City/State           Dist(km) Status  Application Ref.
No.
 11   KTVF     FAIRBANKS AK             395.3  LIC    BLCT      -
19881031KG
 10   NEW      ANCHORAGE
 AK     0.0  APP    USERRECORD-01
 Proposal causes no interference

#########################################################################
#


     Analysis of Interference to Affected Station   4


Analysis of current record
Channel     Call          City/State        Application Ref. No.
   11       KTVA       ANCHORAGE AK             BLCT      -19831019KM

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref.
No.
 10   NEW      ANCHORAGE
 AK    25.6  APP    USERRECORD-01

 Total scenarios =   2


Result key:        2
Scenario        1  Affected station        4
Before Analysis

Results for: 11N AK ANCHORAGE            BLCT      19831019KM   LIC
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour         250632      10652.7
   not affected by terrain losses       249923       9759.9
   lost to NTSC IX                           0          0.0
   lost to additional IX by ATV              0          0.0
   lost to all IX                            0          0.0

 Potential Interfering Stations Included in above Scenario     1


After Analysis

Results for: 11N AK ANCHORAGE            BLCT      19831019KM   LIC
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour         250632      10652.7
   not affected by terrain losses       249923       9759.9
   lost to NTSC IX                           0          0.0
   lost to additional IX by ATV           4997        885.1
   lost to all IX                         4997        885.1

 Potential Interfering Stations Included in above Scenario     1
```

```
10A AK ANCHORAGE
 USERRECORD01           APP

Result key:        3
Scenario        2  Affected station        4
Before Analysis

Results for: 11N AK ANCHORAGE            BLCT      19831019KM   LIC
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour         250632       10652.7
   not affected by terrain losses       249923        9759.9
   lost to NTSC IX                           0           0.0
   lost to additional IX by ATV              0           0.0
   lost to all IX                            0           0.0

 Potential Interfering Stations Included in above Scenario     2


After Analysis

Results for: 11N AK ANCHORAGE            BLCT      19831019KM   LIC
                                      POPULATION   AREA (sq km)
   within Noise Limited Contour         250632       10652.7
   not affected by terrain losses       249923        9759.9
   lost to NTSC IX                           0           0.0
   lost to additional IX by ATV           4997         885.1
   lost to all IX                         4997         885.1

 Potential Interfering Stations Included in above Scenario     2

10A AK ANCHORAGE
 USERRECORD01           APP

#########################################################################
#


     Analysis of Interference to Affected Station   5


Analysis of current record
Channel     Call          City/State        Application Ref. No.
   10      NEW        ANCHORAGE
 AK   USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref.
No.
 09   961115KE ANCHORAGE AK              0.0  APP    BPET      -
19961115KE
 09   960916KE ANCHORAGE AK             40.1  APP    BPET      -
19960916KE
 11   KTVA     ANCHORAGE AK              0.0  CP     BPCT      -
20010426AAO

 Total scenarios =   2
```

Result key: 4
Scenario 1 Affected station 5
Before Analysis

Results for: 10A AK ANCHORAGE
USERRECORD01 APP
HAAT 240.0 m, ATV ERP 27.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	264938	26939.0
not affected by terrain losses	263963	23479.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

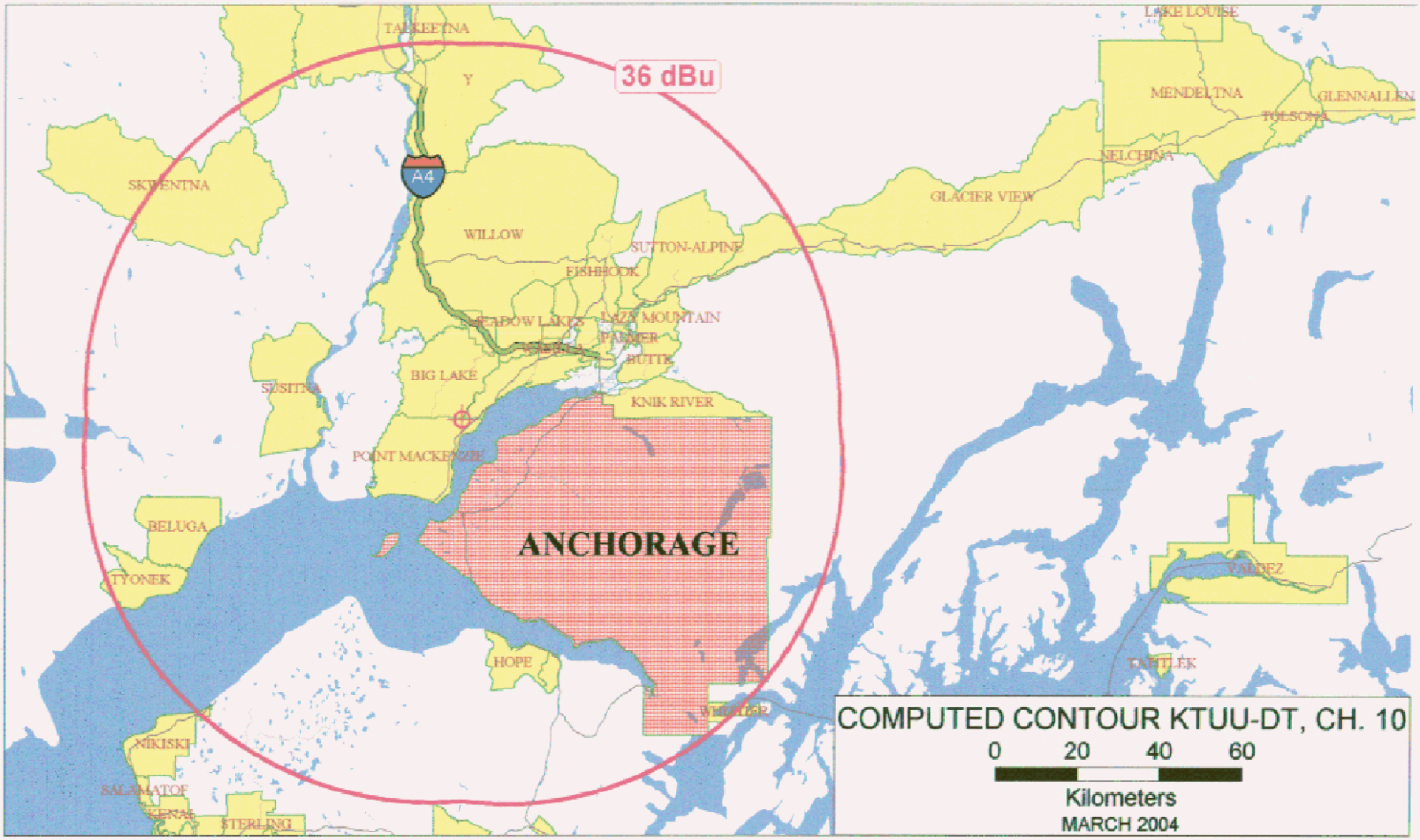
Result key: 5
Scenario 2 Affected station 5
Before Analysis

Results for: 10A AK ANCHORAGE
USERRECORD01 APP
HAAT 240.0 m, ATV ERP 27.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	264938	26939.0
not affected by terrain losses	263963	23479.8
lost to NTSC IX	13	217.8
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	13	217.8

Potential Interfering Stations Included in above Scenario 2

9N AK ANCHORAGE BPET 19960916KE APP


36 dBu
TALKEETNA
Y
SKWENTNA
WILLOW
A4
SUTTON-ALPINE
FISHHOOK
MEADOW LAKES
HAZY MOUNTAIN
PALMER
BUTTE
BIG LAKE
SUSITNA
KNIK RIVER
POINT MACKENZIE
ANCHORAGE
BELUGA
TYONEK
HOPE
WHITTIER
NIKISKI
SALAMATOF
KENAI
STERLING
LAKE LOUISE
MENDELTNA
GLENNALLEN
TOLSONA
NELCHINA
GLACIER VIEW
VALDEZ
TATITLEK
COMPUTED CONTOUR KTUU-DT, CH. 10
0 20 40 60
Kilometers
MARCH 2004

ENGINEERING STATEMENT
IN SUPPORT OF SECOND AMENDMENT TO JOINT PETITION
FOR RULE MAKING
KIMO-DT, ANCHORAGE, ALASKA
CHANNEL 12 50 KW MAX. 240 METERS
MARCH 2004

This engineering statement has been prepared on behalf of Smith Television License Holdings, Inc., licensee of station KIMO(TV), and permittee of KIMO-DT, Anchorage, Alaska in support of a Second Amendment to Joint Petition for Rule Making filed on February 23, 2003 and previously amended on July 24, 2003, ("JPRM") to substitute Channel 12 for the allotted Channel 30 for its digital television (DTV) operation on KIMO-DT.

At present KIMO(TV) operates on analog Channel 13 (210-216 MHz) with 316 kW effective radiated power (ERP) and 238 meters antenna height above average terrain (HAAT) using a non-directional TV antenna from the Frank A. Mengel tower site ("F.A.M. Tower Site"). The geographic coordinates of that site are as follows: N 61° 25' 22", W 149° 52' 20". The F.A.M Tower Site is located approximately 22.7 km (14 miles) north of Anchorage.

The Commission has allotted KIMO(TV) Channel 30 for its digital television (DTV) operation with 1000 kW ERP and 238 meters HAAT. KIMO-DT currently holds a construction permit to operate on DTV Channel 30 with 108 kW ERP and 155 meters HAAT using a directional TV antenna from the F.A.M. Tower site.

In the JRMP, the licensees/permittees of stations KIMO(TV)/KIMO-DT, KTUU-TV/KTUU-DT and KAKM(TV)/KAKM-DT proposed the following amendment to Section 73.622(b) (Digital Television Table of Allotments) of the Commission's rules.

Community	Current Allotment	Proposed Allotment
Anchorage, AK	18, 20, 22, *24, *26 28, 30, 32	*8, 10, 12, 20, 22, *26, 30, 32

The JRMP specified that the substitute DTV channels would be used by the respective DTV stations at the F.A.M. Tower Site. The Second Amendment to the JRMP

("Second Amendment") proposes further changes to the maximum power levels and/or directional antenna system for each DTV allotment. Specifically, the Second Amendment, as it applies to KIMO-DT specifies a slightly different power level for the station. The amended Channel 12 DTV allotment for station KIMO-DT is for 50 kW maximum ERP and 240 meters HAAT (271 meters antenna radiation center above mean sea level) from the F.A.M. Tower Site which is the licensed site for KIMO(TV). The geographic coordinates of the KIMO(TV) site, and thus for the collocated KIMO-DT site, are set forth above.

The attached Tables I and II provide the relative field values for the directional horizontal and vertical patterns of the directional antenna associated with the KIMO-DT Channel 12 DTV allotment.

Analog TV and DTV Allocation Situation

The attached Table III shows the analog TV and DTV stations within 500 km of KIMO-DT site on co-channel 12 and adjacent channels 11 and 13. There are no TV or DTV stations or allotments on Channel 12 within 500 km of KIMO-DT site. Station KTVA-TV, Channel 11, Anchorage, Alaska, site is located 25.7 km south of the KIMO-DT site.

OET Bulletin 69 Study

Since the licensed KTVA, Channel 11 antenna site is located more than 11 km and less than 125 km from the KIMO-DT site, an electromagnetic interference study was conducted according to the FCC OET Bulletin 69 to determine any impact on KTVA's analog TV operation.

The FCC OET Bulletin 69 study was conducted for cell sizes 0.5 km/side and

1 km terrain intervals. In addition, the KIMO-DT ERP in each direction was adjusted according to the horizontal and vertical directional patterns of the DTV antenna.

The results of the OET Bulletin 69 study are provided in the attached Table IV, and indicate the proposed Channel 12 DTV operation of KIMO-DT would not cause harmful interference to more than 2% population of the Grade B contour of KTVA-TV. Therefore, the proposed Channel 12 DTV operation at Anchorage, Alaska would be in compliance of Section 73.623(c) of the Commission's rules.

Principal Community Coverage

The attached map shows the computed 36 dBu contour for the proposed KIMO-DT operation on Channel 12 with 50 kW maximum ERP and 240 meters HAAT using a directional antenna. The map indicates the proposed 36 dBu contour would cover all of Anchorage, Alaska.

It has been demonstrated above the proposed substitution of Channel 12 for Channel 30 would be in full compliance of the Commission's rules. Therefore, the Smith Television License Holdings, Inc., respectfully requests the Commission to allot Channel 12 for KIMO(TV) for its DTV operation (KIMO-DT) at Anchorage, Alaska.

Under penalty of perjury the undersigned states that the foregoing statement has been prepared by him and that the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

11 March 2004

S. K. Khanna
Professional Engineer
District of Columbia, PE License No.8057